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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 16 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
California Public Utilities Commission and)	NSD File No. 98-136
The People of the State of California Petition)	
for Delegation of Additional Authority)	
Pertaining to Area Code Relief and to)	
NXX Code Conservation Measures)	
)	
Massachusetts Department of)	NSD File No. 99-19
Telecommunications and Energy Request)	
For Additional Authority to Implement)	
Various Area Code Conservation Methods)	
In the 508,617, 781 and 978 Area Codes)	
)	
New York Department of Public Service)	NSD File No. 99-21
Petition for Additional Authority to)	
Implement Number Conservation Measures)	
)	
Maine Public Utilities Commission's)	NSD File No. 99-27
Petition for Additional Authority)	
To Implement Number Conservation)	
Measures)	
)	
Florida Public Service Commission's)	NSD File No. 99-33
Petition for Additional Authority)	
To Implement Number Conservation)	
Measures)	
)	
Implementation of the Local)	CC Docket No. 96-98
Competition Provisions of the)	
Telecommunications Act of 1996)	

FURTHER COMMENTS OF
MCI WORLDCOM

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List A B C D E

In response to the Commission's Public Notice DA 99-1198, MCI WorldCom, Inc. (MCI WorldCom) hereby submits further comments on the several state petitions for additional authority to implement number conservation measures.

MCI WorldCom joins the vast majority of commenters in these proceedings and opposes delegations of authority that would fragment the nationwide system of numbering administration.¹ The states have sought broad authority to order substantial, state-specific changes to the manner in which numbers are administered and allocated. Meanwhile, this Commission has adopted and released a Notice of Proposed Rulemaking (NPRM) that seeks comment on national rules regarding the very issues that these petitions seek authority to implement on a state-by-state basis. In this context, there is nothing to gain, and a great deal that could be lost by broad delegations to state commissions outside of the national process. MCI WorldCom stands by its comments on each of these petitions, and comments additionally on two narrow issues.

The California Public Utilities Commission has expressed puzzlement over a perceived inconsistency in MCI WorldCom's positions with respect to number pooling in Florida and in California.² There is no inconsistency. MCI WorldCom fully supports the trial and deployment of an architecture that will enable pooling to take place on a widespread basis, according to national rules. A critical component of that architecture is the Number Portability Administrative Center (NPAC) release 3.0, which will provide,

¹ See, e.g., Comments of the United States Telephone Association, In the Matter of California Public Utilities Commission and the People of the State of California Petition for Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures, NSD File No. 98-136, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, (filed June 14, 1999) at 2-3.

² Reply of the California Public Utilities Commission and the People of the State of California, In the Matter of California Public Utilities Commission and the People of the State of California Petition for Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation

among other features, Efficient Data Representation (EDR). Without EDR, it is infeasible to deploy pooling for more than a trivial number of NPAs. Moreover, the conversion of the thousands of individual records associated with NPAC release 1.4 (the version which supports the Illinois pooling trial) to the EDR format, will be a difficult undertaking that may affect the service of customers. Accordingly, such conversions must be kept to a minimum by not expanding pooling until EDR is available. MCI WorldCom continues to believe that when release 3.0 is ready, Florida would provide an excellent testing environment.

MCI WorldCom opposes the CPUC's request for authority to implement pooling insofar as the CPUC intends to launch mandatory pooling before NPAC release 3.0 will be available. The CPUC has indicated that it believes it could launch mandatory number pooling before the Commission completes its rulemaking.³ Since NPAC release 3.0 is unlikely to be available until after completion of the Commission's rulemaking, this implies that California would proceed using the inefficient, manual processes associated with NPAC release 1.4. As MCI WorldCom has argued, there can be no reliable, widespread deployment of pooling without EDR.⁴ MCI WorldCom supports deployment of pooling in California at the earliest possible date, using NPAC release 3.0.

AT&T has asserted that, based on its SCP capacity, it could support an extension of the 847 pooling trial, using release 1.4, to an additional eight NPAs nationwide.⁵

Measures, NSD File No. 98-136, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98 (filed June 28, 1999) at 12-13.

³ CPUC Petition at 9.

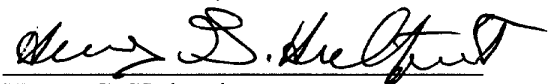
⁴ Indeed, no party has placed any evidence whatsoever on the record to show that widespread deployment of pooling without EDR is possible.

⁵ Comments of AT&T Corp., In the Matter of California Public Utilities Commission and the People of the State of California Petition for Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures, NSD File No. 98-136, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, (filed June 14, 1999) at 5.

Insofar as AT&T means to suggest that additional interim pooling trials might be worthwhile, there is no merit whatsoever to this proposal. Since AT&T made this suggestion, Illinois has expanded its "trial" to four additional NPAs. It appears that AT&T could now support interim pooling in only four NPAs outside of Illinois.⁶ Other carriers may have even less SCP capacity than AT&T.⁷ Given the expansion of pooling in Illinois, it is quite possible that interim pooling cannot occur in any additional NPAs. Moreover, AT&T has ignored the serious and still unresolved issues related to the record conversion that will be required when NPAC release 3.0 is available.⁸

MCI WorldCom urges the Commission, the state commissions, and the industry to work together in order that pooling can be available for widespread deployment, in all parts of the country, as quickly as possible. Until that time, additional interim pooling "trials" should not be permitted.

Respectfully submitted,
MCI WorldCom, Inc.



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⁶ The states have sought authority to order pooling in far more than four NPAs. Massachusetts alone has sought authority for four NPAs.

⁷ Pooling cannot be expanded beyond the data capacity of the service provider with the *least* capacity available.

⁸ AT&T has also proposed delaying resolution of cost recovery issues. However, at this stage an expansion of pooling without resolution of those issues would constitute an irresponsible approach to an important issue.

CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the foregoing Futher Comments of MCI WorldCom, Inc. were sent via first class mail, postage paid, to the following on this 16th day of July, 1999.

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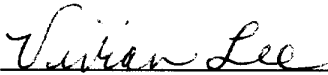
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